

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL NIEWIEDZIAL,

Plaintiff,

v.

GERARDO GUZMAN and ALMA
MARTIJA,

Defendants.

No. 1:21-cv-01593

Hon. Georgia N. Alexakis

JOINT STATUS REPORT PROPOSING EXPERT DISCOVERY SCHEDULE

Pursuant to the Court’s October 3, 2024 Minute Entry (ECF No. 102), Plaintiff Michael Niewiedzial (“Plaintiff”) and Defendants Gerardo Guzman and Alma Martija (“Defendants”) (together, “the Parties”) hereby submit this Joint Status Report. Having met and conferred, the Parties propose the following schedule for the completion of expert discovery:

- December 20, 2024: Plaintiff’s Opening Expert Reports
- February 20, 2025: Defendants’ Responsive Expert Reports
- March 20, 2025: Plaintiff’s Reply Expert Reports
- May 9, 2025: Deadline to Complete Expert Depositions

Dated: October 21, 2024

Respectfully submitted,

/s/ Jason G. Winchester

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Gerardo Guzman and Alma Martija

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Allison L. McQueen

Allison L. McQueen

Attorney for Plaintiff

Michael Niewiedzial